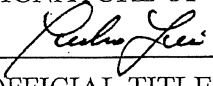



CRIMINAL COMPLAINT
(Electronically Submitted)

United States District Court	DISTRICT of ARIZONA
United States of America v. Ernesto Benjamin Guzman DOB: 1996; United States Citizen	DOCKET NO. MAGISTRATE'S CASE NO. <div style="text-align: right;">25-04368MJ</div>
Complaint for violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: On or about January 14, 2025, in the District of Arizona, Ernesto Benjamin Guzman , knowing and in reckless disregard of the fact that certain illegal aliens, to include Diego Galaviz-Gonzalez and Ricardo Pop-Perez, had come to, entered, and remained in the United States in violation of law, did transport and move said aliens within the United States by means of transportation and otherwise, in furtherance of such violation of law and did so for the purpose of private financial gain; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i) .	
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: On January 14, 2025, in the District of Arizona (Naco), at approximately 2:13 p.m., Border Patrol Agents (BPAs) were notified that a gray Dodge Challengers had traveled southbound on Smith Avenue at 2:09 p.m. and was returning northbound at 2:13 p.m. BPAs noted that Smith Avenue is a dirt road that runs south towards the United States/Mexico International Boundary Barrier, along the west side of the San Pedro River, and is a popular location for Alien Smuggling Organizations to pick up Undocumented Non-Citizens (UNCs). BPAs located the Challenger on Smith Avenue/State Route (SR) 92 and attempted to read the license plate as the Challenger was waiting behind another vehicle at a stop sign. Once the Challenger observed BPAs turn onto Smith Avenue, it pulled around the vehicle that was stationary at the stop sign and began traveling westbound on SR-92. BPAs attempted to conduct a vehicle stop but the Challenger did not yield to BPAs emergency equipment, BPAs terminated the pursuit and allowed a Border Patrol Aerial Asset (VADER) to maintain visual of the Challenger. VADER maintained visual as the Challenger navigated through numerous roads at a high rate of speed, and once BPAs were set up with a Vehicle Immobilization Device (VID), observed it conduct a U-turn on Three Canyons Road once it observed BPAs ahead. At approximately 2:25 p.m., VADER advised that the Challenger stopped near Three Canyons Road/Desert Sumac Drive, where four subjects absconded from the Challenger and began running northbound. The Challenger traveled to Sunshine Lane, which is a one lane dirt road, and was blocked by a BPAs. BPAs conducted a high-risk vehicle stop and identified the driver as Ernesto Benjamin GUZMAN . As BPAs were securing GUZMAN , he informed BPAs that he had a firearm, a Glock 17, within his waistband. BPAs noted that the Glock had a round in the chamber, with a full 17 round magazine loaded. BPAs were able to track, locate, and apprehend all four subjects that absconded from the Challenger, to include Diego Galaviz-Gonzalez and Ricardo Pop-Perez. BPAs conducted an immigration inspection and determined that Galaviz-Gonzalez and Pop-Perez are citizens of Mexico and Guatemala illegally present within the United States. Further records checks confirmed that Galaviz-Gonzalez and Pop-Perez do not possess proper documentation to enter, pass through, or remain within the United States legally. Continued on next page.	
MATERIAL WITNESS IN RELATION TO THE CHARGE: Diego Galaviz-Gonzalez and Ricardo Pop-Perez	
Detention Requested Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.	SIGNATURE OF COMPLAINANT  OFFICIAL TITLE Border Patrol Agent
Sworn by telephone <input checked="" type="checkbox"/>	
SIGNATURE OF MAGISTRATE JUDGE ¹⁾ 	DATE January 15, 2025

¹⁾ See Federal rules of Criminal Procedure Rules 3, 4.1, and 54.
 Reviewing AUSA: Enderle

Continued from front page.

25-04368MJ

Material witness Diego Galaviz-Gonzalez stated that he is a citizen of Mexico and that his stepfather paid an undisclosed amount for him to be smuggled into the United States. Galaviz-Gonzalez stated that he illegally crossed into the United States, using camouflage clothing and cellphone guidance to facilitate his entry. Galaviz-Gonzalez stated that they were guided to SR-92 and informed that a vehicle was coming for them before being picked up by a dark blue sedan. Galaviz-Gonzalez stated that the male driver instructed him to look straight ahead and that once the driver began to flee from BPAs, he was scared because of the speed and kept telling the driver, in Spanish, to stop. Galaviz-Gonzalez stated that once the sedan eventually came to a stop, the driver instructed them, in Spanish, to run.

Material witness Ricardo Pop-Perez stated that he is a citizen of Guatemala and that a family member paid an undisclosed amount for him to be smuggled into the United States. Pop-Perez stated that he illegally crossed into the United States, using camouflage clothing and cellphone guidance to facilitate his entry. Pop-Perez stated that they were guided to a dirt road, where they were picked up by a black or gray two-door coupe vehicle driven by a young male. Pop-Perez stated that four UNC's entered the vehicle and that he had behind the driver. Pop-Perez stated that once the vehicle began to flee from BPAs, he was scared because of the speed.